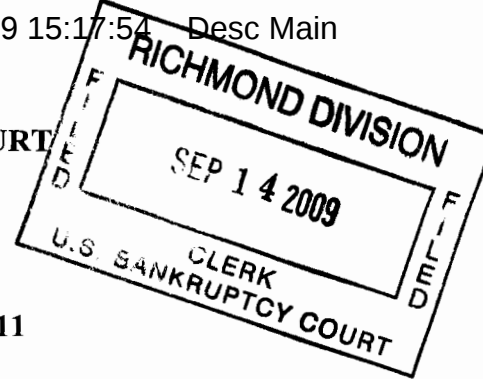


IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION



In Re:	)	CHAPTER 11
	)	
Circuit City Stores, Inc., <u>et al.</u> ,	)	Case No. 08-35653 (KRH)
	)	Claim No. 3634
Debtor(s)	)	(Jointly Administered)


**CLAIMANT'S RESPONSE TO DEBTOR'S THIRTY-FIRST  
OMNIBUS OBJECTION TO CLAIMS**

In response the Claimant, Brad C. King, respectfully represent:

1. Claimant, Brad C. King, suffered an on-the-job injury on approximately March 3, 2008, while employed by Circuit City Stores in Ardmore, Oklahoma.
2. Claimant's injury has been determined to be work-related by the Oklahoma Worker's Compensation Court.
3. Claimant, Brad C. King, continues to be disabled and unable to work.

Wherefore, Claimant, Brad C. King, request the Court to enter an Order Overruling Debtor's Thirty-First Omnibus Objection to Claims and grant such other and further relief as the Court deems appropriate.

Dated September 8, 2009.

  
\_\_\_\_\_  
Brad C. King  
22628 US HWY 70  
Wilson OK 73463  
(580) 668-1265  
CLAIMANT – Claim #3634

**AFFIDAVIT OF BRAD C. KING**

STATE OF OKLAHOMA )  
 )  
COUNTY OF CARTER ) ss

**COMES NOW**, Brad C. King after being duly sworn and on his Oath states as follows:

1. My name is Brad C. King, I am a resident of Carter County, Oklahoma.
2. Starting in October, 2007, I was doing a job, by myself for the most part, that had previously been done by three (3) people. I had repeatedly asked the shipping manager and the supervisor to fill the open position. Having also spoken with the warehouse operations manager and the warehouse manager. I was lifting, turning then sitting down cartons weighing between twenty (20) to eighty (80) pounds. Some days there was six thousand (6,000) or more of these cartons. Having worked the majority of the busiest time of the year by myself. I began having back pain in March, 2008, that continues to this day.

**FURTHER AFFIANT SAYETH NOT.**

  
BRAD C. KING

Subscribed and sworn to before me this 8<sup>th</sup> day of September, 2009.

  
NOTARY PUBLIC

My Commission Expires: 2/2/2013  
My Commission No.: 05001208



**AFFIDAVIT OF MOLLY GODDARD**

STATE OF OKLAHOMA )  
 ) ss  
COUNTY OF CARTER )

**COMES NOW**, Molly Goddard after being duly sworn and on her Oath states as follows:

1. My name is Molly Goddard, I am a resident of Carter County, Oklahoma.
2. Between October, 2007 and March, 2008, I witnessed Brad C. King do the work that had previously been done by three (3) people. This included lifting 20 to 80 pounds numerous times a day.

**FURTHER AFFIANT SAYETH NOT.**

  
MOLLY GODDARD

Subscribed and sworn to before me this 8<sup>th</sup> day of September, 2009.



  
NOTARY PUBLIC

My Commission Expires: 2/2/2013  
My Commission No.: 05001208

**AFFIDAVIT OF JOE KEITH**

STATE OF OKLAHOMA )  
 )  
COUNTY OF CARTER ) ss

**COMES NOW**, Joe Keith after being duly sworn and on his Oath states as follows:

1. My name is Joe Keith, I am a resident of Carter County, Oklahoma.
2. Between October, 2007 and March, 2008, I witnessed Brad C. King do the work that had previously been done by three (3) people. This included lifting 20 to 80 pounds numerous times a day.

**FURTHER AFFIANT SAYETH NOT.**

  
JOE KEITH

Subscribed and sworn to before me this 8<sup>th</sup> day of September, 2009.



  
NOTARY PUBLIC

My Commission Expires: 02-02-13  
My Commission No.: 05001208

**AFFIDAVIT OF CHARLETTA UPTON**

STATE OF OKLAHOMA   )  
  )  
COUNTY OF CARTER   )           ss

**COMES NOW**, Charletta Upton after being duly sworn and on her Oath states as follows:

1. My name is Charletta Upton, I am a resident of Carter County, Oklahoma.
2. I worked at Circuit City in the shipping department. My job title was Shipping Clerk and I had worked for the company for Ten and one-half (10½) years. My job duties was to clear off and make sure every box was cleared, so I was aware of what the volume was in each area and how many people was required in each area, prior to 1996 there was three (3) people in that area. The area the Brad C. King worked should have had at least three (3) people to do that area, but there were times that he was the only one throwing that area with heavy volume and he did that more than three (3) times a week. He also did that during peak season which was the heaviest time of the year. The area that Brad C. King worked in was also the area that had boxes that weigh up to seventy-five pounds (75 lbs) and through an average of six thousand (6,000) boxes. The other area had an average weight of five (5) to thirty (30) pounds and had four (4) peoples in that area.

**FURTHER AFFIANT SAYETH NOT.**

  
CHARLETTA UPTON

Subscribed and sworn to before me this 8<sup>th</sup> day of September, 2009.



  
NOTARY PUBLIC

My Commission Expires: 2/2/2013  
My Commission No.: 5001208


**AFFIDAVIT OF VELVET SCOTT**

STATE OF OKLAHOMA )  
 )  
COUNTY OF CARTER ) ss

**COMES NOW**, Velvet Scott after being duly sworn and on her Oath states as follows:

1. My name is Velvet Scott, I am a resident of Carter County, Oklahoma.
2. Between October, 2007 and March, 2008, I witnessed Brad C. King do the work that had previously been done by three (3) people. This included lifting 20 to 80 pounds numerous times a day.

**FURTHER AFFIANT SAYETH NOT.**

  
VELVET SCOTT

Subscribed and sworn to before me this 8<sup>th</sup> day of September, 2009.



  
NOTARY PUBLIC

My Commission Expires: 02/02/2013  
My Commission No.: 05001208